

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	
)	
Plaintiff,)	C.A. No. 16-122-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.)	
)	
)	
Defendant.)	

IBM'S NOTICE OF 30(B)(1) DEPOSITION OF SARAH BALDWIN

Please take notice that, pursuant to Federal Rules of Civil Procedure 30(b)(1), Plaintiff International Business Machines Corporation ("IBM"), by its counsel, will take the deposition upon oral examination of Sarah Baldwin. The deposition will begin on June 29, 2017, at 9:30 a.m., at the offices of Fenwick & West LLP, 555 California Street 12th Floor, San Francisco, CA 94104, or at such time and place as the parties may agree.

The deposition will be before a Notary Public or other officer authorized by law to administer oaths and will be recorded using videographic, audiographic, and/or stenographic means, or a combination of those means.

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Dated: June 27, 2017

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